

ISMAIL J. RAMSEY
United States Attorney
MATHEW W. PILE (WASBN 32245)
Associate General Counsel
Office of Program Litigation, Office 7
CASPAR CHAN (CSBN 294804)
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4810
Facsimile: (415) 744-0134
Caspar.Chan@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NINH MAI,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

CIVIL NO. 3:22-cv-07344-LJC

**STIPULATION FOR VOLUNTARY
REMAND AND ~~PROPOSED~~ ORDER**

1 IT IS HEREBY STIPULATED, by and between the parties, through their undersigned attorneys,
2 and with the approval of the Court, that the Commissioner of Social Security has agreed to a voluntary
3 remand of this case pursuant to sentence four of 42 U.S.C. § 405(g).

4 On remand, the Commissioner will offer Plaintiff the opportunity for a hearing, further develop
5 the record as necessary, and issue a new decision. The parties further request that the Clerk of the Court
6 be directed to enter a final judgment in favor of Plaintiff, and against Defendant, reversing the final
7 decision of the Commissioner.

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9 Respectfully submitted,

10 Dated: June 20, 2023

SACKETT AND ASSOCIATES

11 By: /s/ Caspar Chan for Harvey P. Sackett*

12 HARVEY P. SACKETT

13 *Authorized by e-mail

14 Attorneys for Plaintiff

15 Dated: June 20, 2023

ISMAIL J. RAMSEY

16 United States Attorney

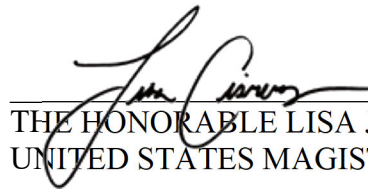
17 By: /s/ Caspar Chan

18 CASPAR CHAN

19 Special Assistant United States Attorney

20 Attorneys for Defendant

21 IT IS SO ORDERED:

22 

23 THE HONORABLE LISA J. CISNEROS
24 UNITED STATES MAGISTRATE JUDGE
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